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October 26, 2011

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Report of *ex parte* presentations in MB Docket No. 03-185

Dear Ms. Dortch:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, this is to report that Byron W. St. Clair, President of the National Translator Association ("NTA"), accompanied by the undersigned NTA counsel, made oral *ex parte* presentations concerning the above-noted proceeding to the following FCC staff members on the dates specified:

October 19, 2011 - Mark Stone of Commissioner Copps's office

October 20, 2011 - Amy Levine of Chairman Genachowski's office

In both meetings, Dr. St. Clair reiterated NTA's position concerning the provision in the July 15, 2011 Report and Order that summarily cancels the license of any translator still operating on an out-of-core channel on December 31, 2011. He pointed out that this harsh provision will needlessly deprive the public of television service and that Section 74.703(g) has long provided a mechanism for clearing any 700 MHz channel on a case-by-case basis when the new user is ready to start operating. He reported that NTA has filed a "Petition for Reconsideration" which discusses the impossibility of fully meeting the December 31, 2011, deadline, but has as yet received no indication from staff members as to whether out-of-core translators will be afforded any relief.

Respectfully submitted,

George R. Borsari, Jr.

Counsel for the

National Translator Association

cc(via email): Mark Stone Amy Levine